

EXHIBIT C

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE)
COMMISSION,)
)
Plaintiff,)
)
vs.) CASE NO:
) 1:23-cv-1346 (JSR)
TERRAFORM LABS PTE LTD. and)
DO HYEONG KWON,)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF JEFFREY KUAN
San Francisco, California
Monday, October 3, 2023

Reported By:
LINDA VACCAREZZA, RPR, CLR,
CRP, CSR NO. 10201
JOB NO. 231003CRT

1 A. Atherton, California.

2 Q. Did you attend college?

3 A. I did.

4 Q. Where did you go to college?

09:54:36 5 A. University of Southern California.

6 Q. What year did you graduate from college?

7 A. 2014.

8 Q. What degree did you obtain?

9 A. Economics.

09:54:49 10 Q. Have you obtained any other -- any
11 advanced degrees?

12 A. An MBA.

13 Q. Where did you get your MBA?

14 A. Wharton.

09:54:55 15 Q. When was that?

16 A. 2020.

17 Q. Where are you currently employed?

18 A. Company called Axelar.

19 Q. What is Axelar?

09:55:05 20 A. Blockchain infrastructure.

21 Q. Do you mind spelling the name of the
22 company for the court reporter?

23 A. A-X-E-L-A-R.

24 Q. What do you do for Axelar?

09:55:18 25 A. Business development.

1 Q. Can you describe what that means?

2 A. I help partnerships, kind of develop
3 different parts of business with strategic -- yeah,
4 strategic initiatives around things that are kind
09:55:42 5 of important to the company.

6 Q. Can you be a little more specific about
7 what types of things you do on a day-to-day basis?

8 A. I partner -- because we are a -- kind of a
9 B to B infrastructure business, I kind of work with
09:55:55 10 and find clients that might be interested in using
11 our infrastructure.

12 Q. How long have you worked for Axelar?

13 A. About a year.

14 Q. Where did you work prior to working at
09:56:08 15 Axelar?

16 A. Fifth.

17 Q. Are you familiar with company called
18 Terraform Labs?

19 A. Fifth.

09:56:14 20 Q. You worked for Terraform Labs as a
21 business development lead starting in or around
22 2020, correct?

23 A. Fifth.

24 Q. What were your duties and responsibilities
09:56:22 25 as lead of business development at Terraform Labs?

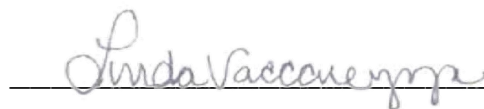
C E R T I F I C A T E

STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

I, LINDA VACCAREZZA, a Certified Shorthand
Reporter for the State of California, do
hereby certify that JEFFREY KUAN, the
witness whose deposition is hereinbefore set
forth, was duly sworn by me and that such
deposition is a true record of the testimony
given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage; and that I am in no way interested
in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 7th day of OCTOBER 2023.


LINDA VACCAREZZA, CSR. NO. 10201